



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

March 16, 2024

BY ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: United States v. Larry Ramos, 23 Cr. 554 (MKV)

Dear Judge Vyskocil:

The Government respectfully moves to exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), from March 20 to April 1, 2024, or any later date that the Court may set for the defendant's bail review hearing. The defense does not object to this application.

On March 4, 2024, Judge Crotty (to whom this case was previously assigned) adjourned the conference previously scheduled for March 6 to March 25, 2024, and excluded Speedy Trial time until March 25, 2024. (Dkt. note). On March 8, 2024, upon the reassignment of the case, this Court set a bail review hearing for March 13, 2024. (Dkt. 23). Later that day, upon the defense motion, the Court adjourned the bail review hearing and conference to April 1, 2024. (Dkt. 25). On March 15, 2024, the defense moved to continue Ramos on bail, or, in the alternative, adjourn the bail review hearing to May. (Dkt. 28). The Government opposed these requests. (Dkt. 29).

Although the defense did not request the exclusion of Speedy Trial time in its motions to adjourn, (Dkts. 24, 28), the exclusion of time from March 25 to April 1, 2024, or any later date that the Court may set for the bail review hearing, serves the ends of justice by accommodating the pre-existing travel plans of defense counsel and the defendant's averred efforts to obtain mental health evaluation and treatment, as set forth in the defense motions.

Respectfully submitted,

DAMIAN WILLIAMS

by:

Alexander Li
Assistant United States Attorney
(212) 637-2265

cc: Inga Parsons, Esq. (by ECF)

All time excluded until April 1, 2024.

Date: March 18, 2024
New York, New York

Mary Kay Vyskocil
United States District Judge